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*Attorneys for Plaintiff,*  
**ASHLEY FREEMAN**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

**ASHLEY FREEMAN,**  
Plaintiff,  
v.  
**SYNCHRONY BANK; AND  
GURSTEL LAW FIRM, P.C.,**  
Defendants.

**Case No.: 2:24-cv-01614-JAM-SCR**

**STIPULATION TO DISMISS  
DEFENDANT SYNCHRONY BANK  
WITH PREJUDICE PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 41(A)**

**HON. JOHN A. MENDEZ**

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Plaintiff ASHLEY FREEMAN (“Plaintiff”) and Defendant SYNCHRONY BANK, by and through their undersigned counsel, respectfully submit this Stipulation for Dismissal pursuant to Rule 41(a) of the Federal Rule of Civil Procedure.

Plaintiff and SYNCHRONY BANK hereby jointly move to dismiss SYNCHRONY BANK WITH PREJUDICE with each party to bear its own costs and attorneys’ fees.

Date: February 6, 2025

**LOKER LAW, APC**

BY: /s/ MATTHEW M. LOKER  
MATTHEW M. LOKER, ESQ.  
ATTORNEY FOR PLAINTIFF

**REED SMITH LLP**

By: /s/ Steven P. Warner  
STEVEN P. WARNER, ESQ.  
ATTORNEY FOR DEFENDANT, SYNCHRONY BANK

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(44) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to all defense counsel, and that I have obtained their authorization to affix electronic signatures to this document.

Date: February 6, 2025

**LOKER LAW, APC**

/s/ MATTHEW M. LOKER  
MATTHEW M. LOKER, ESQ.

**CERTIFICATE OF SERVICE**

A copy of the foregoing *Plaintiff ASHLEY FREEMAN's Stipulation to Dismiss Defendant SYNCHRONY BANK with Prejudice* has been submitted on February 6, 2025 to all defense counsel of record via e-mail.

/s/ MATTHEW M. LOKER

MATTHEW M. LOKER, ESQ.

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5 **UNITED STATES DISTRICT COURT**  
6 **EASTERN DISTRICT OF CALIFORNIA**

7 ASHLEY FREEMAN,

8  
9 Plaintiff,

10 v.

11 SYNCHRONY BANK,

12 Defendant.  
13  
14

Case No.: 2:24-cv-01614-JAM-SCR

**ORDER**

HON. JOHN A. MENDEZ

15  
16 Based upon the Parties' Stipulation, Defendant SYNCHRONY BANK is  
17 **DISMISSED with prejudice**. Each party to bear their own attorneys' fees and  
18 costs. Because this is the last remaining defendant, all previously set deadlines  
19 and hearings are **VACATED**.

20 The Clerk of Court is **DIRECTED** to **CLOSE** the case.

21  
22 IT IS SO ORDERED.

23  
24 Dated: February 07, 2025 /s/ John A. Mendez

25 THE HONORABLE JOHN A. MENDEZ  
26 SENIOR UNITED STATES DISTRICT JUDGE  
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